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In re:	:	UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY
SHAPES/ARCH HOLDINGS L.L.C., <u>et</u> <u>al.</u> ,	:	CHAPTER 11
Debtors.	:	CASE NO. 08-14631 (GMB) (Jointly Administered)
	:	

**APPLICATION FOR ORDER SHORTENING TIME PERIOD FOR
NOTICE OF DEBTORS' OBJECTION TO ADMINISTRATIVE
CLAIMS OF TEAMSTERS LOCAL 837 PENSION FUND SEEKING
RECLASSIFICATION AS GENERAL UNSECURED CLAIM AND
EXPUNGEMENT OF DUPLICATE PROOF OF CLAIM**

TO: THE HONORABLE GLORIA M. BURNS

Your applicant, Jerrold N. Poslusny, Jr., respectfully represents:

1. Your applicant is a member with the firm of Cozen O'Connor, attorneys for the above captioned debtors and debtors-in-possession (the "Debtors").¹ I am familiar with the facts of this case.

2. The Debtors have filed an objection to administrative claims of Teamsters Local 837 Pension Fund seeking reclassification as general unsecured claim and expungement of duplicate proof of claim (the "Objection").

¹ Unless otherwise defined herein, all capitalized terms shall have the meanings ascribed to them in the Application.

3. A shortened hearing date is requested because it would be more efficient for the administration of these cases for the Objection to be heard on the same date as the confirmation hearing, which is scheduled for July 8, 2008 at 10:00 a.m.

4. Further, the claims, if allowed as administrative expense claims, would impair or impede the Debtors from proceeding with confirmation of their plan and risk rendering moot the very negotiations with the Teamsters that enabled the Debtors to satisfy the remaining condition to confirmation of their plan and to proceed to a confirmation hearing.

5. Finally, the Debtors note that the requested relief would provide parties with 11 days to respond to the Objection instead of 20 days required by the Local Rules.

6. Therefore, the Debtors submit that parties in interest will not be prejudiced by a shortened notice period.

7. Reduction of the time period in question is not prohibited under Fed. R. Bankr. P. 9006(c)(1) and the Rules listed therein.

WHEREFORE, your applicant requests entry of the Order submitted herewith.

Dated: June 27, 2008

COZEN O'CONNOR

By: /s/ Jerrold N. Poslusny, Jr.

Mark E. Felger

Jerrold N. Poslusny, Jr.

Attorneys for the Debtors